

## **Exhibit B**

Response to attacking documents on FRE 401, 403: These documents are relevant to the case at hand because they show facts of consequence that have high probative value. For instance,

Exhibit 6: Declaration of Martin J. Oppenheimer: “I have been told by Mako Products Inc., John Dann, that Mako products believes it does not infringe on Mr. Grober’s patent. However, I have no way of determining independently if they are correct as I have no access to the inner workings of their device.” This is highly relevant because Oppenheimer did not do his due diligence in the investigation of patent infringement.

Exhibit 9: US Court of Appeals order; shows the basis for the claim construction for the “payload platform” which is highly relevant to the case at hand.

Exhibit 74: This is a document from the registrar general in the Bahamas stating that Jordan Klein Sr. as the president and director of Opel. This is relevant to prove the relationship of Klein Sr. and Opel.

Exhibit 79: An email showing that the location of the MakoHead’s were in Florida after defendant stated they were in the Bahamas. This refutes testimony that the MakoHead’s were never imported into the US or did not reside in the U.S. and therefore could not have been used for infringing purposes. This is just a sample of the documents that show the Defendant’s objections to the stated documents under Rules 401 and 403 are unsubstantiated.